

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

SEARS HOLDINGS CORPORATION, et al.,  
  
Debtors<sup>1</sup>.

Chapter 11

Case No. 18-23538 (RDD)

(Jointly Administered)

**AMENDED MOTION FOR ADMISSION TO PRACTICE, *PRO HAC VICE***

TO THE HONORABLE COURT:

I, Sonia E. Colón Colón (the “Applicant”), request to amend my admission *pro hac vice*, before Honorable Robert D. Drain, to represent Santa Rosa Mall, LLC, Luan Investment SE, Deportes Salvador Colom Inc. (Adv. Case No. 20-06667), Majestique Corporation (Adv. Case No. 20-06719), and any other creditors that retain me (the “Clients”), in the captioned case and in any and all adversary proceedings and contested matters in which any of the Clients is or may become a party, and in support, submit as follows:

1. *I certify that I am a member in good standing* of the bar in the State of Florida and the Commonwealth of Puerto Rico, and, the bar of the following jurisdictions:

<b>Jurisdiction</b>	<b>Year admitted</b>
U.S. District Court, District of Puerto Rico	1998
U.S. Court of Appeals, 1 <sup>st</sup> Circuit	1998

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); and Sears Brands Management Corporation (5365). The location of the Debtors’ corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

U.S. Bankruptcy Appellate Panel, 1 <sup>st</sup> Circuit	1998
U.S. Court of Appeals, 11 <sup>th</sup> Circuit	1999
U.S. District Court, Middle District of Florida	2008
U.S. District Court, Southern District of Florida	2014
U.S. District Court, Northern District of Florida	2015
U.S. District Court, Eastern District of Wisconsin	2017
U.S. District Court, Eastern District of Texas	2017
U.S. District Court, District of Columbia	2019

2. In support of this document, the Applicant is submitting an affidavit stating (a) whether the Applicant has ever been convicted of a felony, (b) whether the Applicant has ever been censured, suspended, disbarred or denied admission or readmission by any court, (c) whether there are any disciplinary proceedings presently against the Applicant and (d) the facts and circumstances surrounding any affirmative responses to (a) through (c) (the "Affidavit"). The Affidavit is attached hereto as **Exhibit I**.

3. Also in support of this document, Applicant is submitting Good Standing Certificates from the State of Florida and the Commonwealth of Puerto Rico, which are attached hereto as **Exhibit II** and **Exhibit III**, respectively.

4. I have submitted the filing fee of \$200.00 with this *pro hac vice* admission.

Respectfully submitted.  
Orlando, Florida  
Dated: December 16, 2020.

**Ferraiuoli** LLC

390 N. Orange Avenue  
Suite 2300  
Orlando, Florida 32801  
Phone: (407) 982-7310  
Fax: (787) 766-7001



By: Sonia E. Colón Colón  
USDC-PR No. 213809  
[scolon@ferraiuoli.com](mailto:scolon@ferraiuoli.com)

Attorneys for Creditor  
Santa Rosa Mall, LLC, Luan Investment SE,  
Deportes Salvador Colom, Inc., and  
Majestique Corporation